

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

MASTER DOCKET

18-md-2865 (LAK)

This document relates to the cases identified on
Schedule A hereto.

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure (“Rule 26(a)(1)”), George S. Hofmeister, et al (collectively “Hofmeister”) makes the following disclosures. These disclosures are initial only and represent a good-faith effort to identify information reasonably available to Hofmeister at this time. Discovery in this case has not begun and Hofmeister reserves the right to amend, supplement, correct or clarify these disclosures as the case develops. By making these disclosures, Hofmeister is complying with Rule 26(a)(1), not identifying every relevant document, tangible thing or witness. Hofmeister does not waive any privilege, work product protection, or other objection. Hofmeister reserves the right to object to the use of these disclosures, on the grounds of relevancy, competency, materiality, admissibility, or hearsay, or on any other grounds. Hofmeister reserves the right to rely upon testimony of any person who testifies in this case and documents produced by any other party to this case or third party. These disclosures do not include information used to impeach.

I. Individuals And Custodians.

Subject to and without waiving the objections and qualifications set forth above, Hofmeister identifies the following persons as likely to have discoverable information pursuant to Rule 26(a)(1)(A)(i): Mr. Hofmeister and his associated Plan Defendants do not possess any

documents relating to this matter. Mr. Hofmeister understands that any documents relating to same are in the possession of Defendant Bernard Tew.

II. Documents And Data Sources.

Subject to and without waiving the objections and qualifications set forth above, pursuant to Rule 26(a)(1)(A)(ii), Hofmeister lists below documents, electronically stored information (“ESI”), and tangible things they may use to support their defenses.

Mr. Hofmeister and his associated Plan Defendants do not possess any documents or ESI relating to this matter. Mr. Hofmeister understands that any documents or ESI relating to same are in the possession of Defendant Bernard Tew.

III. Computation Of Any Damages.

Mr. Hofmeister and his associated Plan Defendants do not seek any damages.

IV. Insurance Agreements.

None.

SHELDON S. TOLL PLLC
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George S. Hofmeister
JSH FARMS LLC 401(K) PLAN
KRH FARMS LLC 401(K) PLAN
MGH FARMS LLC 401(K) PLAN
MSJJ RETIREMENT GROUP TRUST
SRH FARMS LLC 401(K) PLAN
TRITON FARMS LLC 401(K) PLAN

By: /s/ S. S. Toll
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Dated: June 4, 2019

SKAT, list of clients of SST, 10-27-18

<u>Defendant Name</u>	<u>E.D. Ky Case Nos.</u>
George S. Hofmeister	Defendant in all cases listed below
JSH FARMS LLC 401(K) PLAN	18-397
KRH FARMS LLC 401(K) PLAN	18-399
MGH FARMS LLC 401(K) PLAN	18-396
MSJJ RETIREMENT GROUP TRUST	18-409
SRH FARMS LLC 401(K) PLAN	18-395
TRITON FARMS LLC 401(K) PLAN	18-398